

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 25-MJ-02526-LOUIS

UNITED STATES OF AMERICA,
Plaintiff,
vs.

TOMAS NIEMBRO,
Defendant.

_____ /

UNOPPOSED MOTION TO CONTINUE *NEBBIA* HEARING

Mr. Tomas Niembro (“Mr. Niembro”), through undersigned counsel, respectfully moves this Court to continue the *Nebbia* hearing currently scheduled for April 21, 2025, and requests that it be reset to either May 5 or May 6, 2025, at the Court’s convenience. This request is necessary to allow additional time to complete certified translations of documents Mr. Niembro intends to present at the hearing.

1. On March 15, 2025, Mr. Niembro was arrested on a criminal complaint alleging violations of 18 U.S.C. § 1349 and § 1956(h). [ECF 3; ECF 4]. Two days later, he appeared before Magistrate Judge Lauren Fleischer Louis, who ordered his release on a \$20 million personal surety bond secured by two properties, along with a \$2 million bond requiring 10% cash and a *Nebbia* condition. [ECF 13].
2. On April 11, 2025, during a teleconference, the Court scheduled a *Nebbia* hearing for April 21, 2025. [ECF No. 29]. At that time, undersigned counsel informed the Court that several documents would require

translation and requested a one-week extension. However, counsel underestimated the time needed to complete the translations.

3. The majority of the documents Mr. Niembro intends to present at the Nebbia hearing are in Danish or Spanish. On April 11, 2025, undersigned counsel retained Target Language Translating Services, Inc. (“Target”) to translate them. Target estimates that the Spanish documents alone total approximately 15,000 words and, due to their current workload, expects to complete the translations by April 24 or April 25, 2025.
4. Undersigned counsel has conferred with government counsel and reviewed the parties’ availability. Due to previously scheduled work-related travel, counsel for Mr. Niembro is unavailable the week of April 28. The earliest dates on which both defense counsel and the government are available are May 5 or May 6, 2025. Accordingly, Mr. Niembro respectfully requests that the Court reset the *Nebbia* hearing to either of those dates, at a time convenient for the Court.
5. The government has no objection to the relief sought in this motion.

WHEREFORE, Mr. Niembro respectfully requests that the Court continue the Nebbia hearing currently scheduled for April 21, 2025, and reset it to either May 5 or May 6, 2025.

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CERTIFICATE OF SERVICE

I HEREBY certify that on April 17, 2025, I filed the foregoing document with the Clerk of Court via CM/ECF, which will serve all counsel of record through the Notices of Electronic Filing or other authorized means for those not receiving electronic notices.

By: /s/ Juan J. Michelen
Juan J. Michelen